

# EXHIBIT C



## ATTORNEYS AT LAW

James Spielberger ‡†  
 Gabrielle Klepper \*† ø ★♦‡  
 Lisa Scheibly \*  
 Zane Herman \*  
 Jeffrey Del Rio \*♦‡  
 Christopher A. Fennell \*  
 Abby Salzer \*▲  
 Gary Martoccio \*★ø+♦‡ Charlotte, North Carolina 28202  
 Joshua Robert Rich \*▽  
 Eric D. Rogers \* ø  
 Eric Bossardt \*  
 Samuel Doxsee \*

**RE: Employee: Alana Bailey (alanabailey2016@gmail.com)**  
**Employer: Hiossen**

January 27, 2019

## OFFICES

Charleston  
 Tampa  
 Chicago \*  
 Atlanta \*  
 Charlotte \*  
 Raleigh \*  
 Orlando \*  
 Jacksonville \*  
 Ft. Lauderdale \*  
 Austin \*  
 Houston \*  
 Dallas \*  
 Philadelphia \*  
 Pittsburgh \*  
 Arlington \*  
 \* by apt. only

Dear Sir or Madam:

Alana Bailey has retained this law firm to represent her in connection with her employment discrimination charge against Hiossen. Please direct all future correspondence, communications, and documents regarding this matter to our firm.

Our firm can be contacted at (800) 965-1570 ext. 106. Thank you in advance for your prompt attention to this matter.

Best regards,

A handwritten signature in black ink, appearing to read 'Gary Martoccio'.

Gary Martoccio  
 Gary.martoccio@spielbergerlawgroup.com

## OF COUNSEL:

♦

## ONLY LICENSED IN:

† SC

‡ GA

¤ VA

+ NC

\* IL

ø TX

\* FL

★ AZ

♦ PA

◊ CO

▲ OH

▽ TN

cc: Samuel Doxsee, Esq.  
 Alana Bailey

Administrative Office: 4890 W. Kennedy Blvd. Suite 950, Tampa, Florida 33609

Phone: (800) 965.1570 Fax: (866) 580.7499

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC Agency(ies) Charge No(s):
<small>and EEOC</small>		
<small>State or local Agency, if any</small>		
Name (indicate Mr., Ms., Mrs.) <b>Ms. Alana Bailey</b>		Home Phone (Incl. Area Code) <b>(704) 900-9131</b>
Street Address <b>8306 Denholme Dr</b>		City, State and ZIP Code <b>Waxhaw, NC 28173</b>
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)		
Name <b>Hiossen</b>		No. Employees, Members <b>500</b>
Street Address		Phone No. (Include Area Code) <b>(888) 678-0001</b>
<b>Ms. Bailey worked from Local Branch: 6201 Fairview Rd., Ste 243, Charlotte, NC 28210</b>		
<b>Corporate Office: 270 Sylvan Ave #1130, Englewood Cliffs, NJ 07632</b>		
Name		No. Employees, Members
Street Address		Phone No. (Include Area Code)
DISCRIMINATION BASED ON (Check appropriate box(es).)		
<input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input checked="" type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input checked="" type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify)		DATE(S) DISCRIMINATION TOOK PLACE Earliest <b>03/2019</b> Latest <b>Ongoing</b> <input checked="" type="checkbox"/> CONTINUING ACTION
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):		
<p><b>Statement of Harm:</b> Hiossen has discriminated against me and continues to discriminate against me and treat me in a disparate manner based on my age, I am over the age of 40, and national origin, American.</p> <p>I began working for Hiossen in 2017. I am one of the oldest American female employees working in my region. Hiossen's sales force is predominantly made up of younger employees and Korean employees.</p> <p><b>Failure to Promote:</b> Hiossen's Regional Director Danial Kang (Korean), clearly favors young Korean employees as they are regularly promoted, while older American employees, including me, are over looked by Hiossen. For example, Charles Yi and Sean Kim Sung are both younger Korean employees with less experience who were promoted, while I was ignored when I asked about being promoted to manage an office.</p> <p><b>Continued Page 2</b></p>		
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT
<u>1/24/2020</u>  Date Charging Party Signature		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>	Charge Presented To: <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC  and EEOC <small>State or local Agency, if any</small>								
<small>THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)).</small>									
<b>Continued from Page 1</b>									
<p>In 2019, Hiossen implemented a business model and used the opportunity to escalate its harassment and discrimination. For example, soon after the new model was implemented, Hiossen further targeted me by reassigning the zip codes I worked in without notifying me. This reassignment was intended to drastically reduce my income as Hiossen removed some of the most lucrative zip codes I worked in including 28277. I had just secured two accounts in 28277 and had many promising prospects lined up. The change in zip codes severely hindered my sales numbers. By contrast, newer, younger employees were assigned larger accounts and more favorable zip codes that disproportionately advantaged younger employees in my Charlotte branch while more Korean employees were hired in our region.</p> <p>Prior to the implementation of the Korean business model, I had been consistently meeting or exceeding my sale goals. After, Hiossen began to assign me higher and more unrealistic sales goals, while simultaneously limiting the zip codes I was able to work in. Hiossen also began to subject my work to heightened scrutiny and criticized my sales numbers, which Hiossen itself had intentionally hindered.</p> <p>Additionally, my Branch Manager, Tim Johnson, who is Caucasian American, berates my sales numbers and regularly threatens to terminate me. Mr. Johnson does not berate employees outside of my protected classes in the same way.</p> <p>Hiossen continues to subject me to discrimination and disparate treatment in the workplace.</p>									
<p><b>Statement of Discrimination:</b> I believe I have been discriminated against because of my age in violation of the Age Discrimination in Employment Act of 1967 and my national origin in violation of Title VII of the Civil Rights Act of 1964.</p>									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <small>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</small> </td> <td style="width: 50%; padding: 5px;"> <b>NOTARY – When necessary for State and Local Agency Requirements</b> </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> <small>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</small> </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> <small>SIGNATURE OF COMPLAINANT</small> </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> <small>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</small> </td> </tr> </table>		<small>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</small>	<b>NOTARY – When necessary for State and Local Agency Requirements</b>	<small>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</small>		<small>SIGNATURE OF COMPLAINANT</small>		<small>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</small>	
<small>I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.</small>	<b>NOTARY – When necessary for State and Local Agency Requirements</b>								
<small>I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.</small>									
<small>SIGNATURE OF COMPLAINANT</small>									
<small>SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)</small>									
<small>1/24/2020</small> <small>Date</small>	 <small>Charging Party Signature</small>								